

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

2004 DEC 23 P 5:05

DIRECT REPORT CORPORATION d/b/a
SHAREHOLDER.COM,

Plaintiff,

v.

CCBN.COM, INC., THE THOMSON
CORPORATION, JOHN DOES 1 through 5,
JANE DOES 1 through 5,

Defendants.

Civil Action
No. 04-10535 PBS

**PLAINTIFF SHAREHOLDER.COM'S MOTION TO IMPOUND ITS
MEMORANDUM IN SUPPORT OF ITS MOTION TO COMPEL DEFENDANTS
TO DESIGNATE A KNOWLEDGEABLE RULE 30(B)(6) REPRESENTATIVE
AND TO PERMIT DESIGNEE TO TESTIFY TO FACTUAL INFORMATION**

Pursuant to Local Rule 7.2, Plaintiff Shareholder.com moves for the impoundment of its Memorandum in Support of its Motion to Compel Defendants to Designate a Knowledgeable Rule 30(b)(6) Representative and To Permit Designee to Testify to Factual Information. Impoundment is necessary due to attached documents containing "Highly Confidential" information, which are discussed within and attached as an exhibit to Plaintiff's Memorandum. Under the parties Stipulated Protective Order (attached hereto as Exhibit A), documents filed with the Court containing information designated "Confidential" or "Highly Confidential" must be accompanied by a motion for impoundment.

Respectfully submitted,



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December 23, 2004

CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of the above document to be served upon the attorney of record for each other party by hand on December 23, 2004.

